

Special Master's Proposed Construction of Disputed Terms				
Actual Claims Language	Crossroads' Proposed Construction	Crossroads' Evidence	Defendants' Proposed Construction	Defendants' Evidence
		<p>Hr'g Tr. at 81:12-15, March 8, 2011 (all parties agree that the Petal, Spring and Oeda references disclose systems with a "server" interposed between workstations and storage devices); <i>Id.</i> at 88:2-89:16; 93:4-7; 100:16-24 (Defendants agree that the "translation" distinguished by patentees during reexamination was from high level file system commands into NLLBP requests); <i>Id.</i> at 89:11-16 (parties agree that "allowing access . . . using NLLBP" occurs without a translation from a high level file system command to a NLLBP request); <i>Id.</i> at 91:14-16, 92:1-5, 152:4-7 (Defendants concede that the "network protocols" described in the Oeda, Petal and Spring references included file system commands thus, including "without involving . . . network protocols" is superfluous</p>		

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		<p>to "without involving a translation from a high level file system command to a native low level block protocol request.")</p> <p>April 28, 2011 2d Supp. Decl. of John Levy, Ph.D., ¶7 (CIFS, NFS and FTP are network protocols).</p> <p>March 7, 2011 Decl. of Brian Berg, ¶37 (Defendants' expert uses term "network protocol" broadly such that it would include Fibre Channel).</p> <p>April 28, 2011 2d Supp. Decl. of John Levy, Ph.D., ¶6 (under Defendants' construction, a protocol used for communication over "Fibre Channel based networks" would be a network protocol).</p> <p>February 22, 2011 Decl. of John Levy, Ph.D., ¶¶ 31, 33 (NLLBPs do not have the overhead associated with the use of higher level protocols</p>			

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		to access storage); <i>Id.</i> ¶ 34 (specification describes network servers communicating with storage using NLLBPs).		
<b>Claim 35:</b> The system of claim 34, wherein the supervisor unit is further operable to: maintain a <b>configuration</b> that maps from the host device to a virtual representation of at least a portion of the storage space on the storage device to the storage device; and allow the host device to access only that portion of the storage space that is contained in the map.	<b>Configuration:</b> "A modifiable setting of information."	<b>Configuration:</b> Col. 2, ll. 19-23; Col. 5, ll. 53-54; Col. 6, ll. 58-64 (describing "configuration" as information used to control operation of the storage router and which is modifiable). '147 Patent: Col. 2, ll. 28-32; Col. 9, ll. 36-41 ("configuration" can also include mapping information and additional information, such as information needed to "implement[]" access controls"). Claim 15, Col. 11, ll. 23-28 (the limitation "operable to maintain a configuration wherein the configuration includes a map. . ."	<b>Configuration:</b> "Map"; otherwise indefinite.	See claim 1, <i>supra</i> . No Construction Necessary.

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		<p>would be meaningless under Defendants' proposed construction).</p> <p><b>Extrinsic:</b></p> <p><i>Chaparral</i> Markman Order at 16, Fore Decl. ISO Crossroads' Cl. Const. Br., Ex. L (parties to earlier action agreed to construe "maintain a configuration" to mean "keeping a modifiable setting of information"); February 22, 2011 Decl. of John Levy, Ph.D., ¶46 (person of ordinary skill would understand "maintaining a configuration" to mean "keeping a modifiable set of information").</p>		
<b>Claim 36:</b> The system of claim 35, wherein the <b>configuration</b> comprises a map from a host device ID to a virtual LUN representation of the storage device to a physical LUN of the storage device.	<b>Configuration:</b> "A modifiable setting of information."	<b>Configuration:</b> <b>Intrinsic:</b> Col. 2, ll. 19-23; Col. 5, ll. 53-54; Col. 6, ll. 58-64 (describing "configuration" as information used to control operation of the storage router and which is modifiable).	<b>Configuration:</b> "Map"; otherwise indefinite.	See claim 1, <i>supra</i> .  No Construction Necessary.

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		<p>'147 Patent: Col. 2, ll. 28-32; Col. 9, ll. 36-41 ("configuration" can also include mapping information and additional information, such as information needed to "implement[] access controls").</p> <p>Claim 15, Col. 11, ll. 23-28 (the limitation "operable to maintain a configuration wherein the configuration includes a map..." would be meaningless under Defendants' proposed construction).</p> <p><b>Extrinsic:</b></p> <p><i>Chaparral</i> Markman Order at 16, Fore Decl. ISO Crossroads' Cl. Const. Br., Ex. L (parties to earlier action agreed to construe "maintain a configuration" to mean "keeping a modifiable setting of information"); February 22, 2011 Decl. of John Levy, Ph.D., ¶46 (person of ordinary skill would understand "maintaining a</p>			



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		configuration" to mean "keeping a modifiable set of information").			
<b>Claim 37:</b>					
The system of claim 34, wherein the storage device further comprises storage space partitioned into virtual local storage for the host device.	[No claim term at issue]		[No claim term at issue]		
<b>Claim 38:</b>					
The system of claim 37, wherein the supervisor unit is further operable to prevent the host device from accessing any storage on the storage device that is not part of a virtual local storage partition assigned to the host device.	[No claim term at issue]		[No claim term at issue]		
<b>Claim 39:</b>					
The system of claim 37, wherein the supervisor unit is further operable to prevent the host device from accessing any storage on the storage device that is not part of a virtual local storage partition assigned to the host device.	[No claim term at issue]		[No claim term at issue]		





TABLE OF CITATION ABBREVIATIONS

Abbreviation	Document(s)	Date	Exhibit No. or Range	
			Joint Materials	
Hrg. Tr.	Transcript of <i>Markman</i> Hearing before the Honorable Karl Bayer, Jr.	3/08/2011		
Jt. Ex.	Markman Hearing Joint Exhibits		Jt. Ex. 101-114	
<b>Plaintiff's Pleadings and Exhibits</b>				
Pl. Br.	Plaintiff Crossroads Systems Inc.'s Markman Brief	2/22/2011		
Pl. Br. Ex.	Exhibits to Declaration of Elizabeth Brown Fore dated 2/22/2011 (in support of Plaintiff's brief)		A-FF	
Levy Decl.	Declaration of John Levy, Ph.D.	2/22/2011		
Levy Ex.	Exhibits to Declaration of John Levy, Ph.D.		A-F	
Levy Supp.	Supplemental Declaration of John Levy, Ph.D.	3/07/2011		
Levy Supp. Ex.	Exhibits to Supplemental Declaration of John Levy, Ph.D.		A-L	
Pl. Hrg. Ex.	Crossroads' Markman Hearing Exhibits		P-1 to P-37	
Pl. PHB	Plaintiff Crossroads Systems Inc.'s Post-Hearing Markman Brief	4/29/2011		
Pl. PHB Ex.	Exhibits to Declaration of Elizabeth Brown Fore dated 4/29/2011 (in support of Plaintiff's post-hearing brief)		A-J	
Levy 2 <sup>nd</sup> Supp.	Second Supplemental Declaration of John Levy, Ph.D.	4/28/2011		



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Levy 2 <sup>nd</sup> Supp. Ex.	Exhibits to Supplemental Declaration of John Levy, Ph.D.		A-D
Pl. RPHB	Plaintiff Crossroads Systems Inc.'s Reply Post-Hearing Brief	5/13/2011	
<b>Defendants' Pleadings and Exhibits</b>			
Def. Br.	Brief in Support of Defendants' Proposed Claim Constructions	2/22/2011	
Def. Ex.	Exhibits to Declaration of George W. Webb III (to accompany Defendants' brief) (also entered as Defendants' hearing exhibits)	2/22/2011	Def. Ex. 1-22
Berg Decl.	Declaration of Brian A. Berg	3/07/2011	
Berg App.	Appendices to Declaration of Brian A. Berg		Berg. App. A-J
Def. PHB	Defendants' Post-Hearing Brief on Issues of Claim Construction	4/29/2011	
Def. PHB Ex.	Exhibits to Declaration of George W. Webb III (to accompany Defendants' brief)	4/29/2011	Def. Ex. 23-24
Def. RPHB	Defendants' Reply Post-Hearing Brief on Issues of Claim Construction	5/13/2011	
<b>Frequently Cited Documents</b>			
'035 patent	U.S. Pat. 6,425,035	7/23/2002	Jt. Ex. 101
'147 patent	U.S. Pat. 7,051,147	5/23/2006	Jt. Ex. 102
First Reexam Reply	'035 file history, Reply to Office Action Under <i>Ex Parte</i> Reexamination Dated 2/07/2005	4/06/2005	Def. Ex. 6

Abbreviation	Document(s)	Date	Exhibit No. or Range
Second Reexam Reply	'035 file history, Reply to Office Action Under <i>Ex Parte</i> Reexamination Dated 5/24/2005	7/22/2005	Def. Ex. 7
'147 Reply	'147 file history, Reply to Office Action Dated 1/27/2005	7/27/2005	Def. Ex. 9
Horst Decl.	Declaration of Robert W. Horst and exhibits in <i>Crossroads v. Postvision</i> (W.D. Tex. case 1:10-cv-00652-SS)	5/20/2010	Def. Ex. 16